

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	Case No. 1-20-bk-01062-HWV
David M. Sullivan, aka	:	
David Sullivan,	:	
Debtor	:	
	:	Chapter 13

MOTION TO AMEND WAGE ATTACHMENT

AND NOW, this 2nd day of February 2021, comes the Debtor, David M. Sullivan, aka David Sullivan, by and through his attorney, Strausbaugh Law, PLLC, respectfully represents:

1. Debtor filed a Chapter 13 Petition on March 18, 2020.
2. Debtor receives regular income from employment with Pixelle, 228 S. Main Street, Spring Grove, Pennsylvania 17362 and should be attached under 11 U.S.C. § 1326 to fund the Chapter 13 Plan.
3. On January 30, 2021, the Debtor filed a 2nd Amended Chapter 13 Plan to cure post-petition arrears on his mortgage.
4. The likelihood of success in this case will be much greater if Debtor's income is attached to fund the Plan.
5. Debtor consents to the wage attachment. A copy of this consent is attached hereto as Exhibit "A" and incorporated herein by reference.

WHEREFORE, Debtor respectfully requests that this Honorable Court enter an Order directing the above-mentioned employer to pay the Trustee in the amount set forth in the attached Order.

Respectfully submitted,

Dated: February 2, 2021

STRAUSBAUGH LAW, PLLC

By: /s/Scott J. Strausbaugh

Scott J. Strausbaugh, Esquire

Attorney for Debtor

Attorney I.D. No. 89425

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ORDER

Upon consideration of the above-named Debtors having filed a Petition under Chapter 13 of the Bankruptcy Code and having submitted all future income to the jurisdiction of this Court in accordance with statute,

IT IS THEREFORE ORDERED that until further Order of this Court, the entity from whom the Debtor, David M. Sullivan, receives income:

ATTN: PAYROLL DEPARTMENT
Pixelle
Attention: Human Resources
228 S. Main Street
Spring Grove, PA 17362

deduct from said Debtor's income the sum of **\$570.32** from each weekly paycheck, beginning on the next pay day following receipt of this Order and deduct a similar amount each pay period thereafter, including any period from which the Debtor receives a periodic or lump sum payment as a result of vacation, termination, or any benefits payable to the above Debtor. Said sum is subject to periodic change as necessary. Said sum is to be sent to the Trustee until further notice of change from Debtor's counsel. Remit the deductible sums to:

CHAPTER 13 TRUSTEE
POST OFFICE BOX 7005
LANCASTER PA 17604

IT IS FURTHER ORDERED that the employer from whom the Debtor receives income shall notify the Trustee if the Debtor's income is terminated and the reason therefore.

IT IS FURTHER ORDERED that all remaining income of the Debtor, except the amounts required to be withheld for taxes, social security, insurance, pension, or union dues be paid to the Debtor in accordance with usual payment procedure.

IT IS FURTHER ORDERED that the employer will place the case number (found at the top of this Order) on all checks being forwarded to the Trustee to ensure proper accounting of the funds.

IT IS FURTHER ORDERED that this Order supersedes previous orders made to the subject entity in this case.

IT IS FURTHER ORDERED that this Order will terminate without further Order five (5) years from the date of this Order, if it is not terminated by an earlier Order from this Court or upon correspondence from Debtor's counsel or the Chapter 13 Trustee.

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David Sullivan,	:	
Debtor	:	
	:	Chapter 13

DEBTOR'S CONSENT TO VOLUNTARY WAGE ATTACHMENT

I, David M. Sullivan, hereby consent to an Attachment of Wages for the purposes of funding our Chapter 13 case.

Date: February 2, 2021

/s/David M. Sullivan
David M. Sullivan